

Solutia Inc.

575 Maryville Centre Drive St. Louis, Missouri 63141

P.O. Box 66760 St. Louis, Missouri 63166-6760 Tel 314-674-1000

March 27, 2000

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I January 21, 1999 Administrative Order by Consent June 25, 1999 Support Sampling Plan as approved by letter dated September 9, 1999

- Follow-up to March 17, 2000 Draft Developed Area Sampling Plan
- Proposed Residential Sampling locations

Dear Mr. McAteer,

Attached for your review and comment is additional information on the March 17, 2000 submittal of the Draft Developed Area Sampling Plan ("DASP"). Enclosed are proposed residential sampling locations for the DASP, consistent with the March 17 submittal. The March 17 submittal was pursuant to the following sections of the June 25, 1999 Support Sampling Plan ("SSP"): 7.0 "Soil Sampling Plan"; 7.1 "Extent of Contamination in Undeveloped Area Surface Soils"; and 7.2 "Extent of Contamination in Developed Area Surface Soil Samples".

The enclosed plan shows 31 residences associated with the seven transects as possible sampling locations for the 20 residential samples required for the DASP. The requirements consist of three sampling locations per transect for transects 1 through 6 and two sampling locations for transect 7. We will sample the first residences in each transect for which we receive agreement from the landowner until the required number of samples have been collected.

Per your request, we are also assimilating the results from the background soil locations (3) for your review and use in evaluation of the DASP. These results will be sent to you as soon as available.

Sincerely,

D. M. Light
Manager, Remedial Projects

Sauget Sites Area I Project Coordinator

Sauget Sites Area I Investigation Developed Area Soil Sampling Plan Sample Location Notes

- 1. Field Sampling Plan Requirements consist of three sampling locations per transect for Transects 1 through 6, and two sampling locations for Transect 7.
- 2. No multi-family flats or businesses were considered for sampling locations.
- 3. No absentee landowners were considered for sampling locations.
- 4. Sampling activities targeted to begin week of April 3 in order to complete by April 30.
- 5. Access agreement will be needed for Illinois Quail Run LLC (Pheasant Run Manufactured Home Community) for sampling along Transect 7

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DEVELOPED AREA SOIL SAMPLING PLAN

• Residential Soil Sample Locations

| Transect | Sample <u>Location</u> | Number of Samples | Sample Location Rationale |
|------------|---------------------------|----------------------|--|
| Transect 1 | S-1 to S-3 | 2 | Highest Copper, Zinc, VOC and PCB concentrations |
| | S-5 | 1 | Highest Pesticide concentration |
| Transect 2 | S-1 | 1 | Highest Copper and Zinc concentrations |
| | S-3 | 1 | Highest Pesticide concentrations |
| | S-5 to S-6 | 1 | Highest VOC, SVOC and PCB concentrations |
| Transect 3 | S-2 | 1 | Highest Pesticide concentration |
| | S-3 to S-4 | 1 | Highest Copper, VOC and PCB concentrations |
| | S-7 | 1 | Highest Zinc and SVOC concentrations |
| Transect 4 | S-2 | 1 | Highest Copper and Pesticide concentrations |
| | S-4 | 1 | Highest VOC concentration |
| | S-7 | 1 | Highest Zinc, SVOC and PCB concentrations |
| Transect 5 | S-6 | 1 | Highest Copper and Zinc concentrations |
| | S-4 to S-5 | 1 | Highest SVOC and Pesticide concentrations |
| | S-1 | 1 | Highest VOC and PCB concentrations |
| Transect 6 | S-1 | 1 | Highest Zinc and Pesticide concentration |
| | S-2 | 1 | Highest PCB concentration |
| | S-3 | 1 | Highest Copper and SVOC concentrations |
| Transect 7 | S-1 to S-2 | 1 | Highest Copper, Zinc, VOC and PCB concentrations |
| | S-7 | 1 | Highest SVOC and Pesticide concentrations |
| Total nu | mber of samples | 20 | |

March 17, 2000 Page 1

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Sauget Site Area I Investigation Developed Area Soil Sampling Proposed Sampling Location Land Owners

| | DRAFI | Proposed Samp | oling Location | Lanc |) (V | wners | | | Undeveloped Transect ϕ | okbut |
|-----------------|--|--|---|-------------------------|----------------------|--------------|--|-------------------------------|-------------------------------|---------------------------------|
| 01-20.0 -0. | Owner Name | Address 3102 MISSISSIPPI AVE 1405 NICKELL ST | City CAHOKIA SAUGET E ST LOUIS | State IL IL IL | 6220 6220 6220 | 06 | Property Address 3102 MISSISSIPPI AVE 3104 MISSISSIPPI AVE 3110 MISSISSIPPI AVE | Cahokia Cahokia Cahokia | T1-A No T1-B S T1-C are | eur les samples ing taken |
| 01-2010 141 | HANKINS JAMES | 759 W 38TH ST | - | | | | 103 WALNUT ST | Cahokia | 1-7. | |
| 01-26.0-401-006 | HARITING COMME | | CAHOKIA | IL | 622 | | 107 WALNUT ST | Cahokia | T2-B | |
| | WILKENSEN LLOYD L | 103 WALNUT ST | CAHOKIA | IL | 622 | | 109 WALNUT ST | Cahokia | T2-C | |
| 01-35.0-201-008 | | 107 WALNUT | CAHOKIA | IL | 622 | | 117 WALNUT | Cahokia | T2-D | |
| 01-35.0-201-010 | VANDEVER LEONARD & DEBORA | I 109 WALNUT | CAHOKIA | iL | 622 | | 3301 FALLING SPRINGS RD | Cahokia | T2-E | |
| 01-35.0-201-011 | WEBB SARAH LOUISE ETAL | 117 WALNUT | CAHOKIA | IL | 622 | 206 | 3301 FALLING SI KINGS II | | | 1. |
| 01-35.0-201-015 | PHILLIPS ROBT L | 3301 FALLING SPRINGS RD | Or a row | | | | #D OT | Cahokia | T3-A | V_{\perp} |
| 01-35.0-201-016 | PHILLIPS KODI E | | CAHOKIA | IL | 622 | 2 0 6 | 11 DAVID ST | Cahokia | тз-В 🚶 | Judith! |
| | CETT DUTH \/ | 11 DAVID ST | CAHOKIA | IL | 623 | 206 | 19 DAVID ST | Cahokia | 13-0 | 105 + 11 |
| 01-35.0-103-003 | CLEGGETT RUTH V | 19 DAVID ST | CAHOKIA | IL | 62 | 206 | 61 DAVID ST | Cahokia | T3-D | 5.13 |
| 01-35.0-103-005 | CROSSIN DANNY R & BECKY A | 61 DAVID ST | | IL | | 206 | 3325 BARBER ST | Carlonia | Č | * |
| 01-35.0-103-016 | SCHMIDT LELA | 3325 BARBER ST | CAHOKIA | - | | | | Cahokia | T4-A | |
| 01-35.0-106-003 | SHEPARD LOUIS & PAULYNE | 0020 - | | IL | 62 | 2206 | 109 EDWARD ST | Cahokia | T4-B | 1 |
| 01 00 | | 109 EDWARD ST | CAHOKIA | IL IL | | 2206 | 125 FDWARD ST | Cahokia | TTACLE | East of |
| 01-35.0-205-005 | PRICE LARRY & SHARON | 125 EDWARD | CAHOKIA | | | 2206 | 3516 FALLING SPRINGS RD | Cahokia | T4-D F | F.S. Rd. |
| 01-35.0-205-009 | BLASDEL BILL W & IRENE | 2516 FALLING SPRINGS RD | CAHOKIA | IL " | | 2206 2206 | 3520 FALLING SPRINGS RD | Cahokia | | 7 |
| 01-35.0-212-033 | MCELLIGOTT ROLAND P & DIAN | 3520 FALLING SPRINGS RD | CAHOKIA | IL | _ 04 | 2200 | 0020 | | T5-A | OF 19 118 |
| 01-35.0-400-001 | MC BRIAN FRANK R & MYRNA I | 3520 FALLING SI TIME | | | | 0000 | 8 SCHOOL ST | Cahokia | 1011 | |
| 01-35.0-400-001 | | | CAHOKIA | IL | | 2206 | 12 SCHOOL ST | Cahokia | T5-B | Egmorge |
| ** or 0 105 005 | CUNNINGHAM BRADLEY A | 8 SCHOOL ST | CAHOKIA | 11 | | 2206 | 16 SCHOOL ST | Cahokia | , | |
| 01-35.0-105-005 | A A II / L IN I | 12 SCHOOL ST | CAHOKIA | u | _ | 2206 | 3420 BARBER ST | Cahokia | T5-D | |
| 01-35.0-105-007 | KIDST DALILINE | 16 SCHOOL ST | CAHOKIA | II | | 2206 | 3415 BARBER ST | Cahokia | T5-E | |
| 01-35.0-105-009 | CDDOM & MAXIN | E 3420 BARBER ST | CAHOKIA | - 11 | լ 6 | 32206 | 3415 BARBLIN 31 | | | , |
| 01-35.0-105-031 | | BOF 3415 BARBER ST | <u> </u> | | | | THE TALLING COD PO | Cahokia | | more to |
| 01-35.0-106-012 | OESTRIONER (1812) | | CAHOKIA | l | IL 6 | 62206 | 817 FALLING SPR RD | Cahokia | T6-B / | N Jevens |
| | BRINKMAN MI CHAEL & CAROL | 817 FALLING SPRINGS RD | CAHOKIA | 1 | IL 6 | 62206-120 | 06 819 FALLING SPRINGS RD | Cahokia | T6-C | |
| 01-35.0-311-006 | TO COUTT | 0191 VEFILO 01 | CAHOKIA | , | | 62206 | 100 JEROME LN | Cahokia | T6-D | |
| 01-35.0-311-005 | STEWART SCOTT CROCKETT MICHAEL & LINDA | 100 JEROME LN | CAHOKIA | | IL (| 62206 | 100 KINDER ST | Cahokia | T6-E | |
| 01-35.0-310-00 | TEDDY C | 100 KINDER ST | | | | 62206 | 118 KINDER CR | Cahokia | T6-F | |
| 01-35.0-309-00 | 1 THOMAS BILLY E & TERRY | 118 KINDER DR | CAHOKIA | | | 62206 | 120 KINDER | Callunia | | |
| 01-35.0-309-00 | 4 UNDERWOOD RAY | 120 KINDER | CAHOKIA | | | | | O-kalda | T7-A | |
| 01-35.0-309-00 | 5 UNDERWOOD RAY | · · | | | мо | 63124 | 88 CIRCLE CREEK DR | Cahokia | T7-B | |
| • | | 6 VISTA BROOK | ST LOUIS | - | | 63124 | 89 CIRCLE CREEK DR | Cahokia | 17-C | |
| 01-35.0-305-03 | 7 ILLINOIS QUAIL RUN LLC | 6 VISTA BROOK | ST LOUIS | | | 63124 | 15 CIRCLE CREEK DR | Cahokia | T7-D | |
| 01-35.0-305-03 | 17 ILLINOIS QUAIL RUN LLO | 6 VISTA BROOK | ST LOUIS | | | 63124 | 17 CIRCLE CREEK DR | Cahokia | | |
| 01-35.0-305-03 | 17 II I INOIS QUAIL RUN LLO | 6 VISTA BROOK | ST LOUIS | , | MO | 03124 | , | | 31 | |
| 01-35.0-305-03 | THE STATE PUBLIC | O VIOTA DICOR | | | | | | | • | |

Bold/Italics: Access Agreement Previously Obtained and On File

Updated: 3/23/00 6:26 PM

Transect 1

| 114113001 1 | | | | | | | | Not in | | | | | | | |
|-----------------|------------|------|------|------|------|------|------|--|-------|------|------------|------|-----|------|---|
| CS-B, West Bar | nk | | | | | | | ? | | | | 7 | | 7 | |
| | | S-1 | | S-2 | | S-3 | | S-4 | | S-5 | | S-6 | - | S-7 | - |
| | <u>05'</u> | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | |
| Copper, ppm | 150 | 21 | 230 | 13 | 230 | 24 | 160 | 6.8 | 130 | 4.0 | 8 6 | 14 | 81 | 17 | |
| Zinc, ppm | 1400 | 250 | 340 | 43 | 390 | 80 | 280 | 34 | 270 | 28 | 180 | 45 | 250 | 63 | |
| VOCs, ppb | 396.8 | | 496 | 2.4 | 6.2 | 4.9 | 39 | 7.4 | 17.8 | 2.8 | | | | | |
| SVOCs, ppb | | | | | | | | ************************************** | | | | 69 | 37 | 200 |] |
| Pesticides, ppb | 7.1 | | 2706 | | 3308 | 3.6 | 6808 | 0.1 | 7408 | 2.2 | 3 4 | | 4.0 | 0.3 | |
| PCBs, ppb | 84 | | 109 | 19 | 231 |] | 85 | | 111.8 | | 123 | 12 | 100 | 12 | |

Transect 2

CS-B, East Bank

| • | | | | | 7 | | | | | | | | | |
|-----------------|------|---|-----|------|--------|-------------|------------|-------------|------------|-------------|------------|-------------|--|--|
| | S | S-1 | | -2 | S | -3 | S | 6-4 | S | S-5 | S | 5-6 | | |
| | 05' | <u>3-6'</u> | 05' | 3-6' | 05' | <u>3-6'</u> | <u>05'</u> | <u>3-6'</u> | <u>05'</u> | <u>3-6'</u> | <u>05'</u> | <u>3-6'</u> | | |
| Copper, ppm | 140 | 0.8 | 77 | 7.6 | 87 | 5.9 | 95 | 16 | 69 | 9.3 | 87 | 13 | | |
| Zinc, ppm | 310 | 37 | 190 | 34 | 250 | 30 | 270 | 57 | 210 | 39 | 290 | 51 | | |
| VOCs, ppb | 4.8 | | 242 | | 474 | | 310 | | 475 |] | | | | |
| SVOCs, ppb | | 160 | | 64 | 2.8 | 62 | | | | 120 | 892 |] | | |
| Pesticides, ppb | 11.5 | | 1.7 | 3.4 | 13,102 | 4.5 | 6.1 | | 3003 | | 3106 | | | |
| PCBs, ppb | 130 | *************************************** | 112 | | 52 | | 17 | | 164 | | 64 | | | |

| CS-C, | W | est | Ba | nk |
|-------|---|-----|----|----|
|-------|---|-----|----|----|

| 00 0, 1700t Dan | | | | | | | | | | 7 | | 7 | | |
|-----------------|------|-------------|--------|------|-----|------|-------|------|-------|------|-------|-------------|------------------------|------|
| | | S-1 | S-2 | | | S-3 | | S-4 | S | 5-5 | S | -6 | S-7 | |
| | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' |
| Copper, ppm | 55 | 15 | 65 | 19 | 75 | 9.1 | 77 | 14 | 79 | 2.8 | 48 | 19 | 75 | 10 |
| Zinc, ppm | 160 | 260 | 240 | 65 | 220 | 40 | 300 | 53 | 410 | 24 | 250 | 82 | 460 | 45 |
| VOCs, ppb | | | 305 | | 836 |] | 489.3 | | 597.5 | 204 | 630.9 | | 460 | |
| SVOCs, ppb | 49 | | | 53 | | | 92 | | 140 | 120 | 98 | | <i>[</i> 8860 <i>]</i> | 50 |
| Pesticides, ppb | 1800 | | 13,000 |] | 1.9 | | 8441 | | 5.8 | 1606 | | | 5.9 | |
| PCBs, ppb | 97 | | 116 | | 58 | 9.5 | 90 | | 88 | | 30 | | | |

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| CS-C, East Bank | k | 24 | | | | | | | | •2 | | - ? | | ? |
|-----------------|-----|-------------|-------------|------|--------|------|------|------|------|------|------|----------------|------|-------------|
| | S | S-1 S-2 | | -2 | S- | -3 | | 6-4 | | S-5 | S | 6-6 | | S-7 |
| | 05' | <u>3-6'</u> | 05' | 3-6' | 05' | 3-6' | 5' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | <u>3-6'</u> |
| Copper, ppm | 69 | 12 | 180 | 19 | 27 | 4.4 | 32 | 7.6 | 48 | 6.3 | 39 | 9.5 | 60 | 30 |
| Zinc, ppm | 240 | 44 | 290 | 95 | 77 | 29 | 82 | 40 | 120 | 35 | 140 | 39 | 550 | 190 |
| VOCs, ppb | | 7.2 | | | | | | 91.7 |]— | | | | | |
| SVOCs, ppb | 490 | 8,700 | 58,609 | 379 | 15,896 | 1216 | 1180 | 587 | 8008 | 173 | 1510 | 303 | 3703 | /110,844/ |
| Pesticides, ppb | 2.8 | 1.5 | 79 | 1.3 | 14.7 | 5.9 | 6.8 | 1.8 | 27 | 3.1 | 14.0 | | 58 | 11.2 |
| PCBs, ppb | 46 | | | | | 10 | | 11 | | | | 39 | 9.8 | 53.9 |
| | 61 | | | | | | | | | | | .06 | | |

CS-C, West Bank

| | <u> </u> | | <u>S-2</u> | | S | S-3 | S-4 | | <u>S-5</u> | | S-6 | |
|-----------------|----------|-------------|------------|----------|------|------|--------|-------------|------------|------|-------------|---------------------------------------|
| | 05' | <u>3-6'</u> | 05' | 3-6' | 05' | 3-6' | 05' | <u>3-6'</u> | 05' | 3-6' | 05' | <u>3-6'</u> |
| Copper, ppm | 53 | 15 | 42 | 6.7 | 44 | 16 | 38 | 5.8 | 41 | 5.7 | 87 | 7.3 |
| Zinc, ppm | 230 | 56 | 230 | 35 | 240 | 55 | 230 | 31 | 240 | 32 | 980 | 38 |
| VOCs, ppb | 494 | | 189 | <u> </u> | 174 | | 204 | 155.6 | | | | |
| SVOCs, ppb | | | | | | 120 | 1068 | 140 | 1086 | 120 | 1731 | 880 |
| Pesticides, ppb | 4100 | 5200 | 2502 | | 2203 | 2900 | 11,201 | | 5100 | | 6504 | |
| PCBs, ppb | 165 |] | 95 | | 137 | | 59 | | 19.9 | | 87.4 | · · · · · · · · · · · · · · · · · · · |

CS-E, East Bank

| | S-1 | | | S-2 | | S-3 | | S-4 | | S-5 |
|-----------------|------|-------------|--------------|-------------|------------|-------------|------------|------|------------|------|
| | 05' | <u>3-6'</u> | 05' | <u>3-6'</u> | <u>05'</u> | <u>3-6'</u> | <u>05'</u> | 3-6' | <u>05'</u> | 3-6' |
| Copper, ppm | 31 | 12 | 19 | 14 | 18 | 35 | 21 | 8.6 | 29 | 6.6 |
| Zinc, ppm | 160 | 45 | 82 | 89 | 90 | 160 | 99 | 130 | 120 | 98 |
| VOCs, ppb | | | | 3.5 | · | 2.8 | 4.4 | | | 25 |
| SVOCs, ppb | 123 | | 195 5 | 275 | 718 | 14,138 | 1091 | 2496 | 1947 | 2083 |
| Pesticides, ppb | 4500 | 3000 | 154.9 | | 4.6 | 1.4 | 167.3 | 4.5 | 5.6 | |
| PCBs, ppb | 21 | | 385 | 8.2 | 19.1 | - | 61.2 | 7.8 | | 4.3 |
| | | | | | 10 | 7.0 | | | | |

Transect 7

| | | | | | | | | Č | | · | | 7 | | |
|-----------------|------|------|-----|------|-----|------|-----|------|------------|------|------|------|------|------|
| | S-1 | | | S-2 | | S-3 | | S-4 | <u>S-5</u> | | S-6 | | S | S-7 |
| | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' | 05' | 3-6' |
| Copper, ppm | 130 | 33 | 26 | 14 | 36 | 12 | 21 | 8.1 | 24 | 9.8 | 32 | 16 | 57 | 9.8 |
| Zinc, ppm | 610 | 1800 | 190 | 46 | 280 | 51 | 150 | 49 | 160 | 43 | 310 | 93 | 640 | 60 |
| VOCs, ppb | | 161 | 551 |] | 47 | | | | 83.2 | | | | 5.0 | 65 |
| SVOCs, ppb | 849 | 290 | 833 | 120 | 619 | 165 | 513 | 1201 | 670 | 270 | 1115 | 634 | 5036 | 7828 |
| Pesticides, ppb | 13.9 | 1.8 | 6.5 | | 7.8 | | 0.9 | 1.9 | | | 40 | 0.3 | 93.3 | 1.7 |
| PCBs, ppb | 90 |] | 15 | | 76 | | 34 | | 7.5 | | 38 | 8.4 | 51 | |

7.**1** 2 8 - . 28













